

H. Joseph Acosta,  
SBN 24006731  
**CONDON TOBIN**  
8080 Park Lane, Suite 700  
Dallas, Texas 75231  
Telephone: (214) 265-3852  
Facsimile: (214) 691-6311

**ATTORNEYS FOR DEBTOR AND  
DEBTOR IN POSSESSION**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>In re:</b>	§	
	§	<b>CASE NO. 25-40684-MXM-11</b>
<b>WATCHTOWER FIREARMS, LLC,<sup>1</sup></b>	§	
	§	<b>CHAPTER 11 CASE</b>
<b>Debtor.</b>	§	
	§	

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that a hearing on the Debtor's Motion to Extend the Exclusive Periods to file a Plan and Solicit Acceptance Thereof [Dkt. 227], filed by Debtor Watchtower Firearms, LLC (the "Debtor"), is scheduled for **June 24, 2025 at 2:30 p.m.** (the "Hearing"), before the Honorable Mark X. Mullin. Any objections to the Exclusivity Motion should be filed before such date.

**PLEASE TAKE FURTHER NOTICE** that the Hearing will be conducted in person and Webex video conference. The dial-in information to participate in the Hearing is as follows:

**For WebEx Video Participation/Attendance:**

Link: <https://us-courts.webex.com/meet/mullin>  
Meeting Number: 2310-650-8783

**For WebEx Telephonic Only Participation/Attendance:**

Dial-In: 1.650.479.3207  
Meeting ID: 2310-650-8783

For further instructions on how to participate in the Hearing, please see the attached instructions

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<sup>1</sup> The Debtor's federal identification number is: 88-1830032.

## SERVICE LIST

Susan Hersh  
United States Trustee  
1100 Commerce Street  
Room 976  
Dallas, TX 75202  
*U.S. Trustee*

Texas Attorney General's Office  
Bankruptcy & Collection Division  
P. O. Box 12548  
Austin, TX 78711-2548

Steve J. Mitby  
Michael Barnhart  
Mitby Pacholder Johnson PLLC  
1001 McKinney Street, Suite 925  
Houston, Texas 77002

Dasan USA/Alpha Foxtrot  
2400 Main Street NW  
Duluth, GA 30097

Faxon Firearms  
4348 Le Saint Court  
Fairfield, OH 45014

FisherBroyles, LLP  
P.O. Box 735232  
Dallas, TX 75373

Vaportech  
PO Box 932614  
Atlanta, GA 31193

D&I Tool  
16343 Waverly Drive  
Houston, TX 77032

Fusion Firearms  
200 Rich Street  
Venice, FL 34292

Texas Comptroller of Public  
Accounts  
Revenue Accounting Division-  
Bankruptcy Section  
P.O. Box 13528  
Austin, TX 78711

Department of Treasury  
Alcohol and Tobacco Tax & Trade  
Bureau  
550 Main Street, Suite 8002  
Cincinnati, OH 45202-5215

2020 Exhibits, Inc.  
10550 S. Sam Houston Pkwy W.  
Houston, TX 77071

ThinOps Services  
9450 Pinecroft Ave.  
Suite 9545  
The Woodlands, TX 77387

MJD Solutions  
502 Big Indian Loop  
Mooresville, NC 28117

Angry Bear Arms  
3537 Hwy 32 East  
Salem, MO 65560

Cutting Tools  
5050 Ashley Ct.  
Houston, TX 77041

National Shooting Sports  
Foundation  
PO BOX 4110  
Dept. 3510  
Woburn, MA 01888

Internal Revenue Service  
Special Procedure-Insolvency  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Office of the United States  
Attorney  
3<sup>rd</sup> Floor, 1100 Commerce Street  
Dallas, TX 75242-1699

U.S. Securities and Exchange  
Commission  
Attn: Bankruptcy Counsel  
444 South Flower Street, Suite 900  
Los Angeles, CA 90071-9591

Office of Attorney General  
Main Justice Building, Room 5111  
10<sup>th</sup> & Constitution Avenue, N.W.  
Washington, D.C. 20530

Royal Case Company  
419 E. Lamar Street  
Sherman, TX 75090

Check-Mate Manufacturing  
370 Wyandanch Ave  
West Babylon, NY 11704

United Protective Technologies  
PO Box 1149  
Locust, NC 28097

Pierson Ferdinand LLP  
14800 Frye Road, 2nd Floor  
Fort Worth, TX 76155

Safety Kleen Systems Inc  
PO BOX 975201  
Dallas, TX 75397

Oracle America, Inc.  
500 Oracle Parkway  
Redwood City, CA 94065

A3D Manufacturing  
15220 S. 50th St. Suite 105  
Phoenix, AZ 85044

Texas Capital Bank  
c/o Pragnesh Mistry  
2000 McKinney Ave., Suite 700  
Dallas, TX 75201

Texas Commission on  
Environmental Quality  
Attn: Bankruptcy Program  
P.O. Box 13087  
MC132  
Austin, TX 78711-3087

Kyle L. Dickson  
Murray Lobb, P.L.L.C.  
2200 Space Park Drive, Ste. 350  
Houston, TX 77058

Shawn M. Christianson  
Buchalter, A Professional Corp.  
425 Market Street, Ste. 2900  
San Francisco, CA 94105-3493

Marcus Helt  
Eric C. Seitz  
McDermott Will & Emery LLP  
2501 North Harwood, Suite 1900  
Dallas, TX 75201-1664

Melissa E. Valdez  
Perdue, Brandon, Fielder, Collins &  
Mott LLP  
1235 North Loop West  
Suite 600  
Houston, TX 77008

Trinitee G. Green  
Polsinelli PC  
2950 N. Harwood St., Ste. 2100  
Dallas, TX 75201

Mark Castillo  
Robert Rowe  
Carrington Coleman  
901 Main Street, Ste 5500  
Dallas, TX 75202

Sandberg Investments  
21019 Spring Towne Drive  
Spring, TX 77388

Tara Grundemeier  
Linebarger Grogan Blair &  
Sampson, LLP  
P.O. Box 3064  
Houston, TX 77253-3064

Heather Jobe  
Troy Hales  
Bell Nunnally & Martin LLP  
2323 Ross Avenue, Ste. 1900  
Dallas, TX 75201

Buffy E. Klein  
Husch Blackwell, LLP  
1900 N. Pearl Street, Ste. 1800  
Dallas, TX 75201

KLM Investment Trust  
11821 Doolin Ct.  
Dallas, TX 75230

issued by the Court.

Respectfully submitted,

**CONDON TOBIN**

By: /s/ H. Joseph Acosta  
H. Joseph Acosta  
SBN 24006731  
8080 Park Lane, Suite 700  
Dallas, Texas 75231  
Tel: 214-265-3852  
Fax: 214-265-3800  
jacosta@condontobin.com

**Counsel for the Debtor  
and Debtor in Possession**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 19, 2025, the foregoing Notice of Hearing was served via email through the Courts EM/ECF system on all parties entitled to such notice, and via U.S. First Class Mail on the Parties on the attached service list.

/S/ H.Joseph Acosta  
H. Joseph Acosta

**Judge Mark X. Mullin**

Pursuant to [General Order 2021-06](#), subject to the discretion of the presiding judge of a particular case or proceeding to order otherwise, all hearings before the Court are currently being conducted in one of the following three ways depending upon the nature of the proceeding: (1) in a remote only mode (by video or telephone via the Court's WebEx platform); (2) in an in-person only mode (before the Court in the courtroom); or (3) in a hybrid mode (enabling participants to choose between appearing in person or remotely).

**IMPORTANT NOTICE**

For all cases and proceedings assigned to Judge Mullin, **Judge Mullin has determined to permit both in person and remote attendance at all hearings** (*i.e.*, all such hearings will be conducted in a hybrid mode instead of a remote only or in-person only mode), provided that Judge Mullin may order otherwise with respect to any particular hearing or proceeding in his discretion or for cause shown.

Additionally, for all adversary proceedings assigned to Judge Mullin, **Judge Mullin has determined to permit both in person and remote attendance at all adversary proceeding hearings** notwithstanding the designation of all adversary proceeding hearings (whether evidentiary or non- evidentiary) as in-person only hearings under General Order 2021-06 (*i.e.*, all such adversary proceeding hearings will be conducted in a hybrid mode instead of an in-person only mode), provided that Judge Mullin may order otherwise with respect to any particular hearing in his discretion or for cause shown.

**WEBEX HEARING INSTRUCTIONS**

**The following instructions apply to remote attendance at hybrid mode hearings.**

**General Information:**

Subject to compliance with the procedures and requirements set forth herein, counsel and other parties in interest are permitted to attend and participate in hybrid hearings by remote means (*i.e.*, by WebEx videoconference or telephonic conference) without first obtaining permission of the Court to do so. The WebEx videoconference login and WebEx telephonic conference dial-in and meeting ID are set out below:

**For WebEx Video Participation/Attendance:**

Link: <https://us-courts.webex.com/meet/mullin>

**For WebEx Telephonic Only Participation/Attendance:**

Dial-In: 1.650.479.3207

Meeting ID: 2310-650-8783

**Participation/Attendance Requirements Applicable to All Remote Attendees:**

- Requirements as to attendance by videoconference or telephonic conference:
  - (1) For those who intend to question any witness(es) or seek the admission of any document(s) in evidence, such individuals must attend in a videoconference mode (as opposed to a telephonic conference mode).
  - (2) For those who do not intend to question any witnesses or seek the admission of any documents in evidence but who nevertheless intend to actively participate in the hearing, such individuals are encouraged, but not required, to attend in a videoconference mode.
  - (3) All others may attend in either a videoconference or telephonic conference mode.

- Remote attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. During hearings, attendees are required to keep their lines on mute at all times that they are not addressing the Court or otherwise actively participating in the hearing. **The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings.** For general information and tips with respect to WebEx participation and attendance, please see [Clerk's Notice 20-04](#).

### **Remote Witness Testimony:**

Witnesses are permitted to testify in-person or by remote means unless ordered otherwise by the Court.

Where remote testimony is permitted, witness testimony must be provided with the WebEx video function activated. Witnesses may not provide testimony by telephone alone unless the Court finds cause to waive the prohibition (only in rare circumstances).

### **Exhibit Requirements:**

- Any party intending to introduce documentary evidence at a hybrid mode hearing must file an exhibit list in the case with a true and correct copy of each designated exhibit filed as a separate, individual attachment thereto so that the Court and all participants have ready access to all designated exhibits.
- For any witness that is to be called to testify remotely, the party calling the witness must, in advance of the hearing, supply to the witness (or counsel for the witness, as appropriate) with paper copies of all designated exhibits for the hearing.

### **Notice of Hearing Content and Filing Requirements for Hybrid Mode Hearings:**

- The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted both in person and by WebEx means, (2) provide notice of the above WebEx video link and telephone dial-in and meeting ID, and (3) attach a copy of these WebEx Hearing Instructions or provide notice that they may be obtained at the following address: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-mullin-hearing-dates>
- When electronically filing the Notice of Hearing via CM/ECF select “Fort Worth, Judge Mullin’s Ctrm” or “at<https://us-courts.webex.com/meet/mullin>” as the location for the hearing. Do **NOT** select “VIDEO CONFERENCE” link as the location for the hearing.

### **Disclaimer:**

The Court cannot and does not guarantee that telephonic service and computer connectivity will not be interrupted during the course of a hearing. For hybrid hearings, those who elect to participate in the hearing by remote means do so at their own risk, understanding that except in extremely rare circumstances the Court will not entertain a request for continuance of the hearing based upon technological failure or any disadvantage experienced on account of an election to attend remotely instead of in person.